UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

AMERICAN INTERNATIONAL GROUP, INC., et al.,	
Plaintiffs,) v.)	No.: 07 CV 2898
ACE INA HOLDINGS, INC., et al., Defendants.	 Judge Robert W. Gettleman Magistrate Judge Sidney I. Schenkier) <l< td=""></l<>
LIBERTY MUTUAL INSURANCE CO., et al., Counter-Claimants, v.	
AMERICAN INTERNATIONAL GROUP, INC., et al., Counter-Defendants.	
SAFECO INSURANCE COMPANY OF AMERICA and OHIO CASUALTY INSURANCE COMPANY, individually, and on behalf of a class consisting of members of the National Workers Compensation Reinsurance Pool,	No. 09 C 2026 Judge Robert W. Gettleman Magistrate Judge Sidney I. Schenkier
Plaintiff,) v.) AMERICAN INTERNATIONAL GROUP, INC., et al.,)	
Defendants.)	

NOTICE OF MOTION

To: All Counsel of Record

PLEASE TAKE NOTICE that on Thursday, June 16, 2011, at 9:15 a.m., we shall appear before the Honorable Robert W. Gettleman or any judge sitting in his stead in Room 1703 of the United States District Courthouse, 219 South Dearborn Street, Chicago, Illinois, and then and there present the ORIGINAL CLASS PLAINTIFFS' SECOND MOTION TO STRIKE

ALL OR PORTIONS OF DECLARATIONS SUBMITTED WITH JUNE 3 REPLY

BRIEFS, a copy of which is hereby served upon you.

Dated: June 13, 2011 Respectfully submitted,

SAFECO INSURANCE COMPANY OF AMERICA AND OHIO CASUALTY INSURANCE COMPANY

By: s/ Gary M. Elden

One of their Attorneys

Gary M. Elden (#0728322)
Matthew O. Sitzer (#6210083)
GRIPPO & ELDEN LLC
111 South Wacker Drive
Chicago, IL 60606
(312) 704-7700
gelden@grippoelden.com
msitzer@grippoelden.com

Michael A. Walsh (admitted *pro hac vice*) Allison D. Burroughs (admitted *pro hac vice*) NUTTER, McCLENNEN & FISH, LLP 155 Seaport Boulevard Boston, Massachusetts 02110 Telephone: (617) 439-2775

mwalsh@nutter.com aburroughs@nutter.com

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on June 13, 2011, I caused a true and correct copy of the foregoing **NOTICE OF MOTION** to be filed with the Clerk of the Court and served using the CM/ECF e-filing system upon all counsel of record.

s/ Gary M. Elden
Gary M. Elden